

EXHIBIT A

**IN THE UNITED STATES DISTRICT COURT
OF THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

SSCP RESTAURANT INVESTORS LLC,

Plaintiff,

V.

JIGNESH N. PANDYA, RONAK J. PANDYA, VALENTINO F. DIGIORGIO III, KRUPA PATEL, PANDYA RESTAURANT GROWTH BRANDS, LLC, PANDYA MANAGEMENT, LLC, ENGAGE BRANDS, LLC, and BOSTON MARKET CORPORATION,

Defendants

Civil Action No. ____ : ____ -cv- ____

AFFIDAVIT OF WILLIAM D. CARSON

STATE OF TEXAS §
§
COUNTY OF DALLAS §

BEFORE ME, the undersigned Notary Public, on this day personally appeared William D. Carson who swore on his oath that the following facts are true:

1. My name is William D. Carson. I am over the age of eighteen years old, am fully competent to render this affidavit, and have personal knowledge of the factual matters and opinions given herein.

2. I am an attorney at Cozen O'Connor, P.C. and represent Valentino F. DiGiorgio in this matter.

3. Attached hereto as Exhibit 1 is a business record of Cozen O'Connor, P.C. This record is kept by Cozen O'Connor, P.C. in the ordinary course of business, and it was the regular course of business of Cozen O'Connor, P.C. for an employee or representative of Cozen O'Connor, P.C. with knowledge of the act, event, condition, opinion, or diagnosis, recorded to make the records

or to transmit information thereof to be included in such record, and the records were made at or near the time or reasonably thereafter. The record attached hereto is the original or exact duplicates of the original.

4. Exhibit 1 is a true and correct copy of the emails exchanged between lead attorney for Valentine F. DiGiorgio in this matter, Kendall Kelly Hayden, and Defendant Jignesh "Jay" N. Pandya, wherein consent to the removal of the above-captioned matter to this Court is given.

Further affiant sayeth not.



WILLIAM D. CARSON

Subscribed and sworn to before me, a Notary Public, on this 6th day of August 2024.



Michelle R. Garcia

Notary Public for the State of Texas

My Commission Expires: 1-21-24

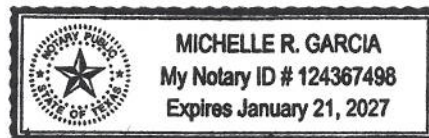


EXHIBIT 1

From: [Jay Pandya](#)
To: [Hayden, Kendall Kelly](#)
Cc: [REDACTED]; [Hackett, David](#); [Carson, William](#); [REDACTED]
Subject: Re: SSCP Investors, LLC v. Jignesh Pandya, et al.
Date: Tuesday, August 6, 2024 12:30:52 PM

****EXTERNAL SENDER****

Hello Kendall,

I give consent to move to federal court. Thanks

From: Hayden, Kendall Kelly <khayden@cozen.com>
Date: Monday, August 5, 2024 at 8:24 PM
To: Jay Pandya <j[REDACTED]a@rohangroup.net>
Cc: [REDACTED]; [Hackett, David](#) <dhackett@cozen.com>, [Carson, William](#) <WCarson@cozen.com>, [REDACTED]
[REDACTED]
Subject: SSCP Investors, LLC v. Jignesh Pandya, et al.

Hi Jay,

My law firm has been retained to represent Val DiGiorgio in the above referenced lawsuit. I plan to remove this case to federal court, and our deadline to do so is **Wednesday, August 7, 2024**. Val must have all served Defendants' consent to remove this case. My records show that Pandya Restaurant Growth Brands, LLC, Pandya Management, LLC, and Engage Brands, LLC have all been served, but that Boston Market Corporation, Krupa Patel, Ronak Pandya, and you have not yet been served. If our records are correct, I understand that you could provide consent as the authorized representative for each of these served Defendants (Pandya Restaurant Growth Brands, LLC, Pandya Management, LLC, and Engage Brands, LLC) to remove this case. Would you consent to removal to federal court, and kindly provide a one page letter in writing consenting to same? If easier on you, if you send us your letterhead, we can draft for your signature. Thank you very much.
Kendall



Kendall Kelly Hayden
Member | Cozen O'Connor
1717 Main Street, Suite 3100 | Dallas, TX 75201
P: 214-462-3072 F: 972-755-1733 C: [REDACTED]
[Email](#) | [Bio](#) | [LinkedIn](#) | [Map](#) | [cozen.com](#)

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